



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION IX**  
**75 Hawthorne Street**  
**San Francisco, CA 94105-3901**

7/6/2009

Russell E. Galipeau  
Superintendent,  
Channel Islands National Park  
1901 Spinnaker Drive  
Ventura, CA 93001

**Subject:** Draft Environmental Impact Statement (DEIS) for the Prisoners Harbor Coastal Wetlands Restoration Project, Channel Islands National Park, California (CEQ #20090151)

Dear Mr. Galipeau:

The Environmental Protection Agency (EPA) has reviewed the above referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

EPA supports the Project's purpose and goals. We concur that the more extensive efforts to restore habitat in the preferred alternative will be most beneficial to those species that depend upon it. We have rated this Draft Environmental Impact Statement (DEIS) as LO (Lack of Objections). Please see the enclosed Summary of EPA Rating Definitions for further explanation of our rating system. While we support the preferred alternative, we offer the following recommendations below for the control of non-native species and the protection of human health.

**Control of Non-Native Species**

The DEIS includes a significant discussion of invasive plant species, but contractor equipment inspection is the primary method proposed to avoid the transport of unwanted weeds. Similarly, the DEIS only mentions rodent control for landing craft, as a means to ensure that rodents are not transported to the park. In addition to the DEIS, the National Park Service (NPS) provided EPA a copy of its Draft Non-Native Species Prevention Plan for the Channel Islands National Park, California (undated). We recommend that appropriate prevention activities mentioned in this plan be incorporated into the DEIS as mitigation measures or best management practices, including:

- Construction equipment will be taken apart and (or) washed prior to transportation to the island, if it has openings and crevices for weeds, soil, invertebrates, and vertebrates to hide.
- An NPS representative will educate construction personnel on the importance of controlling non-native species.

- Organic erosion control material, such as hay bales, will be prohibited.
- The last location the equipment was used will dictate more stringent control measures (e.g. if the area is known to have sudden oak death or red imported fire ants).

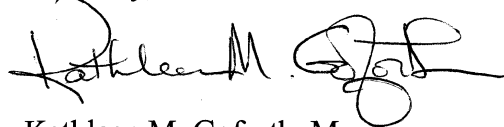
### Air Quality

In light of the serious human health impacts associated with particulate matter, EPA typically recommends incorporation of best available control measures into a Final EIS. Because of the relative small scale of this project, we offer these fugitive dust control measures as suggestions for your consideration.

- NPS should water dry soil in excavation and fill areas to minimize dust migration during windy conditions, and install wind fencing.
- When hauling material and operating non-earthmoving equipment, NPS should prevent spillage and limit speeds to 15 miles per hour (mph). NPS should also limit speed of earthmoving equipment to 10 mph.

We appreciate this opportunity to review the DEIS. When the Final EIS is released for public review, please send one copy to the address above (mail code: CED-2). If you have questions, please contact me at (415) 972-3521, or contact Tom Kelly, the lead reviewer for this project. Tom can be reached at 415-972-3856 or [kelly.thomasp@epa.gov](mailto:kelly.thomasp@epa.gov).

Sincerely,



Kathleen M. Goforth, Manager  
Environmental Review Office (CED-2)

Enclosure: Summary of EPA Rating Definitions

cc: Matthew Vandersande, U.S. Army Corps of Engineers